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6 Attorneys for Defendants
7 WELLS FARGO BANK, N.A.

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

10 DAVID STRONG,

11 Plaintiff,

12 vs.

13 EXPERIAN INFORMATION SOLUTIONS,
INC.; WELLS FARGO BANK, NATIONAL
14 ASSOCIATION; TD BANK USA,
NATIONAL ASSOCIATION AND DOES 1
15 THROUGH 100 INCLUSIVE,

16 Defendants.

Case No. 3:17-CV-00503-RS

**STIPULATION TO EXTEND TIME FOR
DEFENDANT WELLS FARGO BANK,
N.A. TO RESPOND TO FIRST AMENDED
COMPLAINT AND ~~PROPOSED~~ ORDER**

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18 Plaintiff DAVID STRONG (“Plaintiff”) and defendant WELLS FARGO BANK, N.A.,
19 (“Defendant”), hereby stipulate as follows:

20 **RECITALS**

21 1. Plaintiff filed this action against Defendant on January 31, 2017 and served
22 Defendant on February 2, 2017.

23 2. Defendant’s initial deadline to respond to the Complaint was February 23, 2017

24 3. Plaintiff and Defendant agreed to extend the time for Defendant to respond to the
25 Complaint up to and including March 27, 2017, so that Defendant could have additional time to
26 investigate this matter and the parties may explore the possibility of settlement.

27 4. On or about March 15, 2017, Plaintiff informed Defendant that he intended to file a
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1 First Amended Complaint in the Action no later than April 7, 2017. Accordingly, Plaintiff and
2 Defendant agreed that Defendant's deadline to respond to the complaint should be further
3 extended to, April 28, 2017, which was 21 days from the anticipated date of Plaintiff filing an
4 amended complaint.

5 5. Plaintiff did not file an amended Complaint by April 7, 2017, but anticipates filing
6 an amended complaint by April 28, 2017, rendering it appropriate for Defendant to wait until the
7 filing of the amended complaint prior to preparing a response.

8 6. Plaintiff and Defendant stipulate that Defendant's deadline to respond to the
9 anticipated First Amended Complaint or, in the event no amended complaint is filed, the initial
10 complaint, shall be up to and including May 26, 2017.

11 7. This change in deadline will not alter the date of any event or any deadline already
12 fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

13 THEREFORE, the parties stipulate as follows:

14 **STIPULATION**

15 1. The deadline for Defendant to respond to the anticipated First Amended Complaint
16 or, in the event no amended complaint is filed, the initial complaint, shall be up to and including
17 May 26, 2017.

18 2. This change in deadline will not alter the date of any event or any deadline already
19 fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

20 **IT IS SO STIPULATED.**

21 DATED: April 26, 2017

SAGARIA LAW, P.C.

22
23 By: /s/ Elliot W. Gale

Elliot W. Gale

24 Attorneys for Plaintiff DAVID STRONG
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1 DATED: April 26, 2017

SEVERSON & WERSON
A Professional Corporation

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4 By: /s/ Alisa A. Givental
Alisa A. Givental

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6 Attorneys for Defendants WELLS FARGO BANK,
N.A.

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8 Pursuant to Local Rule 5-1(i)(3), I -- Alisa A. Givental -- attest that concurrence in the filing of
this document has been obtained from Elliot W. Gale. /s/ Alisa A. Givental

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10 **~~[PROPOSED]~~ ORDER**

11 Pursuant to the stipulation of the parties and good cause appearing, Wells Fargo Bank,
12 N.A.'s deadline to respond to the anticipated First Amended Complaint or, in the event no
13 amended complaint is filed, the initial complaint, shall be up to and including May 26, 2017. No
14 other deadlines shall be affected by this Order.

15 IT IS SO ORDERED.

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17 DATED: 4/28/17

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HONORABLE RICHARD SEEBORG
UNITED STATES JUDGE